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8 *Attorneys for Plaintiffs*

9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**  
11 **WESTERN DIVISION**

11 CENTER FOR BIOLOGICAL  
12 DIVERSITY, et al.,

13 *Plaintiffs,*

14 v.

15 DEBRA HAALAND, et al.,

16 *Defendants,*

17 SABLE OFFSHORE CORP.,

18 *Intervenor-Defendant.*  
19

Case No. 2:24-cv-05459-MWC-MAA

**DECLARATION OF KRISTEN  
MONSELL IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
LEAVE TO FILE FIRST  
SUPPLEMENTAL AND  
AMENDED COMPLAINT**

20  
21 I, Kristen Monsell, hereby declare as follows:

22 1. I am counsel for Plaintiffs Center for Biological Diversity and Wishtoyo  
23 Foundation in this case. I submit this declaration in support of Plaintiffs' Motion  
24

1 for Leave to File First Supplemental and Amended Complaint. If called as a  
2 witness, I could and would competently testify to the matters set forth herein.

3 2. Attached as Exhibit 1 is a true and correct copy of the permits Federal  
4 Defendants the Bureau of Safety and Environmental Enforcement, et al.  
5 (collectively, BSEE) issued to Sable Offshore Corp. on September 25, 2024. I  
6 obtained a copy of both permits on BSEE's website here:  
7

8 [https://www.bsee.gov/stats-facts/ocs-regions/pacific/pacific-region-completed-](https://www.bsee.gov/stats-facts/ocs-regions/pacific/pacific-region-completed-applications-for-permit-to-modify-apm)  
9 [applications-for-permit-to-modify-apm.](https://www.bsee.gov/stats-facts/ocs-regions/pacific/pacific-region-completed-applications-for-permit-to-modify-apm)

10 3. Attached as Exhibit 2 is a true and correct copy of the letter Plaintiff  
11 Center for Biological Diversity received from BSEE regarding its response to a  
12 Freedom of Information Act request for the records documenting and supporting  
13 BSEE's issuance of the permits referenced in paragraph 2 above.  
14

15 I declare under penalty of perjury that the foregoing declaration is true and  
16 correct to the best of my knowledge.

17 Executed this 3rd day of January 2025,  
18

19 /s/ Kristen Monsell  
20 Kristen Monsell  
21  
22  
23  
24

# **EXHIBIT 1**

Application for Permit to Modify (APM)

Lease	P00182	Area	SM	Block	6683	Well Name	HE023	ST	00	BP	00	Type	Development
Application Status		Approved											
		Operator		03726 Sable Offshore Corp									
Pay.gov				Agency				Pay.gov					
Amount: \$145.00				Tracking ID: EWL-APM-253736				Tracking ID: 27HQJCVF					
General Information													
API		043112075100		Approval Dt		25-SEP-2024		Approved By		Carl Lakner			
Submitted Dt		19-SEP-2024		Well Status		Completed		Water Depth		1075			
Surface Lease		P00182		Area		SM		Block		6683			
Approval Comments													
Conditions of Approval: 1) All operations must be conducted in accordance with the OCS Lands Act (OCSLA), the lease terms and stipulations, the regulations of 30 CFR Part 250, Notices to Lessees and Operators (NTLs), the approved (revised) Application for Permit to Modify (APM/RPM), and any written instructions or orders of the District Manager. 2) A copy of this permit (including all attachments) must be kept on location and made available to inspectors upon request during the permitted operation. 3) All pressure containing equipment must be tested to the approved permitted pressure and recorded on the daily operations report. If well pressures exceed the SITP/MASP stated in the approved permit, the equipment in use must be tested at a minimum to the new observed pressure. The appropriate District must be immediately notified of this pressure change and a RPM submitted to document the change. 4)WARS Due BY Wednesdays													
Correction Narrative													
Permit Primary Type Enhance Production													
Permit Subtype(s)													
Other Enhance Production													
<input checked="" type="checkbox"/> Proposed or <input type="checkbox"/> Completed Work													
Operation Description													
Use electricline to add 181' MD of perforations, 51' MD in the MC 10 and 130' MD in the MC 20.													
Procedural Narrative													
See attachment.													
Subsurface Safety Valve													
Type Installed SCSSV													
Feet below Mudline 639													
Maximum Anticipated Surface Pressure (psi) 2336													
Shut-In Tubing Pressure (psi)													
Maximum Anticipated Wellhead Pressure (psi)													
Shut-In Wellhead Pressure (psi) 1420													
Rig Information													
Name		Id		Type		ABS Date		Coast Guard Date					
Blowout Preventers													
Preventer		Size		Working Pressure		--- Test Pressure ---							
Wireline Luber				10000		Low High							

Application for Permit to Modify (APM)

Lease	P00182	Area	SM	Block	6683	Well Name	HE023	ST	00	BP	00	Type	Development
Application Status	Approved			Operator	03726 Sable Offshore Corp								
Date Commencing Work (mm/dd/yyyy)	01-OCT-2024												
Estimated duration of the operation (days)	9												
Verbal Approval Information													
Official						Date (mm/dd/yyyy)							
Questions													
Number	Question					Response	Response Text						
A	Is H2S present in the well? If yes, then comment on the inclusion of a Contingency Plan for this operation.					YES	H2S Plan Approved.						
B	Is this proposed operation the only lease holding activity for the subject lease? If yes, then comment.					YES	Hold SYU Lease.						
C	Will all wells in the well bay and related production equipment be shut-in when moving on to or off of an offshore platform, or from well to well on the platform? If not, please explain.					N/A							
D	If sands are to be commingled for this completion, has approval been obtained?					N/A							
E	Will the completed interval be within 500 feet of a block line? If yes, then comment.					NO							
F	For permanent abandonment, will casings be cut 15 feet below the mudline? If no, then comment.					N/A							
G	Will you ensure well-control fluids, equipment, and operations be designed, utilized, maintained, and/or tested as necessary to control the well in foreseeable conditions and circumstances, including subfreezing conditions?					YES							
H	Will digital BOP testing be used for this operation? If "yes", state which version in the comment box?					N/A							

Application for Permit to Modify (APM)

Lease	P00182	Area	SM	Block	6683	Well Name	HE023	ST	00	BP	00	Type	Development
Application Status	Approved												
Operator	03726 Sable Offshore Corp												

Questions

Number	Question	Response	Response Text
I	Is this APM being submitted to remediate sustained casing pressure (SCP)? If "yes," please specify annulus in the comment box. If you have been given a departure/denial for SCP, include in the attachments.	NO	
J	Are you pulling tubulars and/or casing with a crane? If "YES" have documentation on how you will verify the load is free per API RP 2D. This documentation must be maintained by the lessee at the lessee's field office.	N/A	
K	Will the proposed operation be covered by an EPA Discharge Permit? (Please provide permit number comments for this question).	N/A	
L	Will you be using multiple size work string/ tubing/coil tubing/snubbing/wireline? If yes, attach a list of all sizes to be used including the size, weight, and grade.	N/A	
M	For both surface and subsea operations, are you utilizing a dynamically positioned vessel and/or non-bottom supported vessel at any time during this operation?	NO	

ATTACHMENTS

File Type	File Description
pdf	Well HE23 CER
pdf	HE23 BSEE APM

CONTACTS

Name	Ben Martin
Company	Sable Offshore Corp
Phone Number	713-859-7391
E-mail Address	bmartin@sableoffshore.com
Contact Description	Director of Completions, Sable Offshore Corp.

Application for Permit to Modify (APM)

CERTIFICATION: I certify that information submitted is complete and accurate to the best of my knowledge. I understand that making a false statement may subject me to ci

Name and Title	Date
Brian Hansen, Regulatory Advisor	19-SEP-2024

PAPERWORK REDUCTION ACT OF 1995 (PRA) STATEMENT: The PRA (44 U.S.C. 3501 et seq. Requires us to inform you that we collect this information to obtain knowledge of equipment and procedures to be used in drilling operations. MMS uses the information to evaluate and approve or disapprove the adequacy of the equipment and/or procedures to safely perform the proposed drilling operation. Responses are mandatory (43 U.S.C. 1334). Proprietary data are covered under 30 CFR 250.196. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number. Public reporting burden for this form is estimated to average 11/4 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to the Information Collection Clearance Officer, Mail Stop 4230, Minerals Management Service, 1849 C Street, N.W., Washington, DC 20240.

## Application for Permit to Modify (APM)

**Lease** P00182    **Area** SM    **Block** 6683    **Well Name** HE023    **ST** 00    **BP** 00    **Type** Development  
**Application Status** Approved    **Operator** 03726 Sable Offshore Corp

### Variances Requested for this Permit



## Application for Permit to Modify (APM)

**Lease** P00182    **Area** SM    **Block** 6683    **Well Name** HE023    **ST** 00    **BP** 00    **Type** Development  
**Application Status** Approved    **Operator** 03726 Sable Offshore Corp

### Existing Variances

No previously approved variances exist for this permit

Application for Permit to Modify (APM)

Lease P00182    Area SM    Block 6683    Well Name HE023    ST 00    BP 00    Type Development  
Application Status Approved    Operator 03726 Sable Offshore Corp

Reviews

Review:	APM - District Production Engineering Review
Sent:	20-SEP-24
Review Started:	25-SEP-24
Review Finished:	25-SEP-24
Info Adequate:	Y
Review Remarks:	

Review:	Determination of NEPA Adequacy
Sent:	20-SEP-24
Review Started:	20-SEP-24
Review Finished:	20-SEP-24
Info Adequate:	Y
Review Remarks:	

Application for Permit to Modify (APM)

Lease	P00182	Area	SM	Block	6683	Well Name	HE028	ST	00	BP	00	Type	Development
Application Status		Approved											
Operator		03726 Sable Offshore Corp											
Pay.gov				Agency				Pay.gov					
Amount: \$145.00				Tracking ID: EWL-APM-253740				Tracking ID: 27HR3FNL					
General Information													
API 043112076200				Approval Dt 25-SEP-2024				Approved By Carl Lakner					
Submitted Dt 19-SEP-2024				Well Status Completed				Water Depth 1075					
Surface Lease P00182				Area SM				Block 6683					
Approval Comments													
Conditions of Approval:													
1) All operations must be conducted in accordance with the OCS Lands Act (OCSLA), the lease terms and stipulations, the regulations of 30 CFR Part 250, Notices to Lessees and Operators (NTLs), the approved (revised) Application for Permit to Modify (APM/RPM), and any written instructions or orders of the District Manager.													
2) A copy of this permit (including all attachments) must be kept on location and made available to inspectors upon request during the permitted operation.													
3) All pressure containing equipment must be tested to the approved permitted pressure and recorded on the daily operations report. If well pressures exceed the SITP/MASP stated in the approved permit, the equipment in use must be tested at a minimum to the new observed pressure. The appropriate District must be immediately notified of this pressure change and a RPM submitted to document the change.													
4)WARS Due BY Wednesdays													
Correction Narrative													
Permit Primary Type Enhance Production													
Permit Subtype(s)													
Other Enhance Production													
<input checked="" type="checkbox"/> Proposed or <input type="checkbox"/> Completed Work													
Operation Description													
Use electricline to add 115' MD of perforations in the MC 10.													
Procedural Narrative													
See attachment													
Subsurface Safety Valve													
Type Installed SCSSV													
Feet below Mudline 575													
Maximum Anticipated Surface Pressure (psi) 2320													
Shut-In Tubing Pressure (psi)													
Maximum Anticipated Wellhead Pressure (psi)													
Shut-In Wellhead Pressure (psi) 1881													
Rig Information													
Name		Id		Type		ABS Date		Coast Guard Date					

Application for Permit to Modify (APM)

Lease	P00182	Area	SM	Block	6683	Well Name	HE028	ST	00	BP	00	Type	Development
Application Status	Approved			Operator	03726 Sable Offshore Corp								
Blowout Preventers													
--- Test Pressure ---													
Preventer		Size		Working Pressure		Low		High					
Wireline Luber				10000				5000					
Date Commencing Work (mm/dd/yyyy) 10-OCT-2024													
Estimated duration of the operation (days) 6													
Verbal Approval Information													
Official										Date (mm/dd/yyyy)			
Questions													
Number		Question				Response		Response Text					
A		Is H2S present in the well? If yes, then comment on the inclusion of a Contingency Plan for this operation.				YES		H2S Plan is approved.					
B		Is this proposed operation the only lease holding activity for the subject lease? If yes, then comment.				YES		Hold SYU Leases.					
C		Will all wells in the well bay and related production equipment be shut-in when moving on to or off of an offshore platform, or from well to well on the platform? If not, please explain.				N/A							
D		If sands are to be commingled for this completion, has approval been obtained?				N/A							
E		Will the completed interval be within 500 feet of a block line? If yes, then comment.				NO							
F		For permanent abandonment, will casings be cut 15 feet below the mudline? If no, then comment.				N/A							
G		Will you ensure well-control fluids, equipment, and operations be designed, utilized, maintained, and/or tested as necessary to control the well in foreseeable conditions and circumstances, including subfreezing conditions?				YES							
H		Will digital BOP testing be used for this operation? If "yes", state which version in the comment box?				N/A							

Application for Permit to Modify (APM)

Lease	P00182	Area	SM	Block	6683	Well Name	HE028	ST	00	BP	00	Type	Development
Application Status	Approved												
Operator	03726 Sable Offshore Corp												

Questions

Number	Question	Response	Response Text
I	Is this APM being submitted to remediate sustained casing pressure (SCP)? If "yes," please specify annulus in the comment box. If you have been given a departure/denial for SCP, include in the attachments.	NO	
J	Are you pulling tubulars and/or casing with a crane? If "YES" have documentation on how you will verify the load is free per API RP 2D. This documentation must be maintained by the lessee at the lessee's field office.	N/A	
K	Will the proposed operation be covered by an EPA Discharge Permit? (Please provide permit number comments for this question).	N/A	
L	Will you be using multiple size work string/ tubing/coil tubing/snubbing/wireline? If yes, attach a list of all sizes to be used including the size, weight, and grade.	N/A	
M	For both surface and subsea operations, are you utilizing a dynamically positioned vessel and/or non-bottom supported vessel at any time during this operation?	NO	

ATTACHMENTS

File Type	File Description
pdf	Well HE-28 CER
pdf	HE28 BSEE APM

CONTACTS

Name	Ben Martin
Company	Sable Offshore Corp
Phone Number	713-859-7391
E-mail Address	bmartin@sableoffshore.com
Contact Description	Director of Completions, Sable Offshore Corp.

Application for Permit to Modify (APM)

CERTIFICATION: I certify that information submitted is complete and accurate to the best of my knowledge. I understand that making a false statement may subject me to ci

Name and Title	Date
Brian Hansen, Regulatory Advisor	19-SEP-2024

PAPERWORK REDUCTION ACT OF 1995 (PRA) STATEMENT: The PRA (44 U.S.C. 3501 et seq. Requires us to inform you that we collect this information to obtain knowledge of equipment and procedures to be used in drilling operations. MMS uses the information to evaluate and approve or disapprove the adequacy of the equipment and/or procedures to safely perform the proposed drilling operation. Responses are mandatory (43 U.S.C. 1334). Proprietary data are covered under 30 CFR 250.196. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number. Public reporting burden for this form is estimated to average 11/4 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to the Information Collection Clearance Officer, Mail Stop 4230, Minerals Management Service, 1849 C Street, N.W., Washington, DC 20240.

## Application for Permit to Modify (APM)

**Lease** P00182    **Area** SM    **Block** 6683    **Well Name** HE028    **ST** 00    **BP** 00    **Type** Development  
**Application Status** Approved    **Operator** 03726 Sable Offshore Corp

### Variances Requested for this Permit

## Application for Permit to Modify (APM)

**Lease** P00182    **Area** SM    **Block** 6683    **Well Name** HE028    **ST** 00    **BP** 00    **Type** Development  
**Application Status** Approved    **Operator** 03726 Sable Offshore Corp

### Existing Variances

No previously approved variances exist for this permit



Application for Permit to Modify (APM)

Lease

P00182

Area

SM

Block

6683

Well Name

HE028

ST

00

BP

00

Type

Development

Application Status

Approved

Operator

03726 Sable Offshore Corp

Reviews

Review:	APM - District Production Engineering Review
Sent:	20-SEP-24
Review Started:	25-SEP-24
Review Finished:	25-SEP-24
Info Adequate:	Y
Review Remarks:	

Review:	Determination of NEPA Adequacy
Sent:	20-SEP-24
Review Started:	20-SEP-24
Review Finished:	20-SEP-24
Info Adequate:	Y
Review Remarks:	

# **EXHIBIT 2**



## United States Department of the Interior

BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT

Pacific OCS Region

760 Paseo Camarillo, Suite 102

Camarillo, CA 93010-6064

December 10, 2024

Ann K. Brown  
Center for Biological Diversity  
P.O. Box 11374  
Portland, OR 97211  
(Sent via email to: foia@biologicaldiversity.org)

Re: FOIA Request #DOI-2025-000724

Dear Ms. Brown:

This constitutes our final production in response to your FOIA request dated October 16, 2024.

### **Description of Request**

On October 16, 2024, the Bureau of Safety and Environmental Enforcement (BSEE) received your Freedom of Information Act (FOIA) request for the following:

*“The Center requests from the Bureau of Safety and Environmental Enforcement (“BSEE”) Pacific Region from June 1, 2024 to the date that BSEE conducts this search: the records documenting and supporting BSEE’s September 25, 2024, approval of two Applications for Permit to Modify to Sable Offshore Corp. (Operator 03726) for Well HE023 and Well HE28 for Lease P00182 on the Pacific Outer Continental Shelf, including but not limited to, the agency’s “Determination of NEPA Adequacy” and “District Production Engineering Review”.”*

### **Production**

Today, in response to your request, the BSEE is providing via email the cover letter and 49 pages of full disclosure documents we have determined to be releasable; portions of this material are exempt from release under the following exemptions:

Exemption 4 of the FOIA (5 U.S.C. 552 (b) (4), which protects trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential.

Exemption 9 of the FOIA (5 U.S.C. 552 (b)(9)), which pertains to geological and geophysical information concerning wells.

Mr. Gurney Small, Attorney-Advisor with the Office of the Solicitor was consulted in reaching this decision.

**Appeal Rights—43 C.F.R. §§ 2.57, .58, .59**

You may appeal this response to the Department's FOIA/Privacy Act Appeals Officer. If you choose to appeal, the FOIA/Privacy Act Appeals Officer must receive your FOIA appeal no later than 90 workdays from the date of this final response. Appeals arriving or delivered after 5 p.m. Eastern Time, Monday through Friday, will be deemed received on the next workday. Your appeal must be made in writing. You may submit your appeal and accompanying materials to the FOIA/Privacy Act Appeals Officer by mail, courier service, fax, or email. All communications concerning your appeal should be clearly marked with the words: "FREEDOM OF INFORMATION APPEAL." You must include an explanation of why you believe this response is in error. You must also include with your appeal copies of all correspondence between you and BSEE concerning your FOIA request, including your original FOIA request and this response. Failure to include with your appeal all correspondence between you and BSEE will result in the Department's rejection of your appeal, unless the FOIA/Privacy Act Appeals Officer determines (in the FOIA/Privacy Act Appeals Officer's sole discretion) that good cause exists to accept the defective appeal. Please include your name and daytime telephone number (or the name and telephone number of an appropriate contact), email address and fax number (if available) in case the FOIA/Privacy Act Appeals Officer needs additional information or clarification of your appeal.

DOI FOIA/Privacy Act Appeals Office Contact Information  
Department of the Interior Office of the Solicitor  
1849 C Street, N.W. MS-6556 MIB  
Washington, DC 20240  
Attn: FOIA/Privacy Act Appeals  
Office Telephone: (202) 208-5339 Fax: (202) 208-6677  
Email: [FOIA.Appeals@sol.doi.gov](mailto:FOIA.Appeals@sol.doi.gov)

**Conclusion**

For your information, Congress excluded three discrete categories of law enforcement and national security records from the requirements of FOIA. See 5 U.S.C. 552(c). This response is limited to those records that are subject to the requirements of FOIA. This is a standard notification that is given to all our requesters and should not be taken as an indication that excluded records do, or do not, exist. The 2007 FOIA amendments created the Office of Government Information Services (OGIS) to offer mediation services to resolve disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. Using OGIS services does not affect your right to pursue litigation. You may contact OGIS in any of the following ways:

Office of Government Information Services  
National Archives and Records Administration  
8601 Adelphi Road – OGIS  
College Park, MD 20740-6001  
email: [ogis@nara.gov](mailto:ogis@nara.gov)

Web: <https://ogis.archives.gov>  
Telephone: (202) 741-5770  
Fax: (202) 741-5769  
Toll-free: (877) 684-6448

Please note that using OGIS services does not affect the timing of filing an appeal with the Department's FOIA & Privacy Act Appeals Officer.

This completes our response to your request. If you have any questions, I can be contacted at (805) 384-6344, or you can send an email to [rochelle.williams@bsee.gov](mailto:rochelle.williams@bsee.gov).

Sincerely,

**X ROCHELLE  
WILLIAMS** Digitally signed by  
ROCHELLE WILLIAMS  
Date: 2024.12.10  
14:59:19 -08'00'

---

Rochelle K. Williams  
FOIA Specialist